

STATEMENT OF BASIS (AI No. 12741)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0076171 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Energy Cranes, LLC
Houma Facility
279 Thompson Road
Houma, Louisiana 70363

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: June 1, 2005

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LWDPs permit - (WP1634)
LWDPs permit effective date: January 9, 1995
LWDPs permit expiration date: January 8, 2000

D. LPDES permit - (LA0076171)**
LPDES permit effective date: December 1, 2000
LPDES permit expiration date: November 30, 2005

E. Date Application Received: September 9, 2004

**The previous permit was issued to American Aero Cranes. Effective August 4, 2003, the facility was acquired by Energy Cranes, Inc.; therefore, the renewal permit will be issued to Energy Cranes, Inc.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - oilfield service company

Energy Cranes, Inc. is an existing oilfield service company that repairs cranes and their components.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 1389, 3533

C. LOCATION - 279 Thompson Road, Houma, Terrebonne Parish
Latitude 29°32'40", Longitude 90°41'09"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: equipment washwater and stormwater runoff
Treatment: oil/water separator
Location: at the point of discharge from the oil/water separator located on the north side of the facility (Latitude 29°32'40", Longitude 90°41'9")
Flow: 3600 gpd
Discharge Route: unnamed ditch thence to Munson Slip thence to the Houma Navigational Canal

Outfall 002

Discharge Type: treated sanitary wastewater
Treatment: activated sludge package plant
Location: at the point of discharge from the sewage treatment plant located on the northwest corner of the facility (Latitude 29°32'40", Longitude 90°41'9")
Flow: 500 gpd
Discharge Route: unnamed ditch thence to Munson Slip thence to the Houma Navigational Canal

4. RECEIVING WATERS

STREAM - unnamed ditch, thence to Munson Slip, thence to Houma Navigational Canal

BASIN AND SEGMENT - Terrebonne Basin, Segment 120509

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There are no recent inspections at the facility.

B. DMR Review/Excursions

DMR's were reviewed for the past three years. DMR's were not submitted for the following:

Outfall 001: October-December 2004, July-September 2003, April-June 2003, January-March 2003, October-December 2002, July-September 2002, April-June 2002, July-September 2001, and April-June 2001

Outfall 002: January-June 2003, July-December 2002, January-June 2002, January-June 2001

The following is a list of excursions:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
3/04	TSS	001	456 mg/L	45 mg/L
3/04	BOD	002	104 mg/L	45 mg/L
3/04	TSS	002	60 mg/L	45 mg/L
3/04	Fecal Coliform	002	7360 col	400 col/100 mL
12/03	Fecal Coliform	002	3200 col	400 col/100 mL
12/01	TSS	001	214 mg/L	45 mg/L
12/01	Fecal Coliform	002	50,000 col	400 col/100 mL

7. EXISTING EFFLUENT LIMITS

Outfall 001 - equipment washwater and stormwater runoff

Parameter	LPDES	
	Monthly Average	Daily Max
Flow - gpd	---	Report 1/3 months Est.
COD	---	125 mg/L 1/3 months Grab
TOC	---	50 mg/L 1/3 months Grab
Oil and Grease	---	15 mg/L 1/3 months Grab
TSS	---	45 mg/L 1/3 months Grab
Soaps and Detergents	Report 1/3 months Inventory Calculation	---
pH	6 - 9 s.u. 1/3 months - Grab	

Outfall 002 - treated sanitary wastewater

Parameter	LPDES
	Weekly Average
Flow - gpd	Report 1/6 months Est.
BOD	45 mg/L 1/6 months Grab
TSS	45 mg/L 1/6 months Grab
Fecal Coliform	400 col/100 mL 1/6 months Observation
pH	6 - 9 s.u. 1/6 months - Grab

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120509 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2004 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in

Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Energy Cranes, LLC

1. **Outfall 001 - equipment washwater and stormwater runoff** (estimated flow is 3600 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	
COD	---:125 mg/L	LAG480000, previous permit, BPJ
Oil & Grease	---:15 mg/L	LAG480000, previous permit, BPJ
TSS	---:45 mg/L	LAG480000, previous permit, BPJ
pH	6.0 -9.0 s.u.	LAG480000, previous permit, BPJ
Soaps & Detergents	---:Inventory	LAG480000, previous permit, BPJ
Visible Sheen	---:No Presence	LAG480000, BPJ

Treatment: oil/water separator

Monitoring Frequency: 1/day for visible sheen; 1/month for all other parameters at the point of discharge from the oil/water separator. The monitoring frequency will be increased to 1/month based on the lack of DMR's sent in for this outfall.

Limits Justification: Limits based on discharges on Light Commercial Facilities General Permit LAG480000, Schedule B. EPA Guideline for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements are being placed in the permit.

2. **Outfall 002 - treated sanitary wastewater** (estimated flow is 500 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg. (mg/l)	<u>Reference</u>
Flow	---:Report	
BOD ₅	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)
TSS	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)
Fecal Coliform	---:400/100mL	LPDES General Permit LAG480000 (BPJ)
pH	6.0 -9.0 s.u.	LPDES General Permit LAG480000 (BPJ)

Treatment: activated sludge package plant

Monitoring Frequency: 1/quarter for all parameters at the point of discharge from the sewage treatment plants. The monitoring frequency will be increased to 1/3 months based on the lack of DMR's sent in for this outfall.

Limits Justification: Light Commercial Facilities General Permit LAG480000, Schedule A and previous LPDES permit.

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BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL/303(d) Listed Waterbodies

Subsegment 120509 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDL's.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2341.B.14.k, stormwater discharges from facilities classified as SIC Code 1389 are considered to be associated with industrial activities. Therefore, an SWP3 is included in the permit.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements for the AI).